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Examiner	:	BILGRAMI, Asghar H.
Title	:	METHOD AND APPARATUS FOR PLAYING MULTIMEDIA AUDIO-VISUAL PRESENTATIONS
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REPLY BRIEF

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REPLY BRIEF

The Applicant respectfully traverses the examiner's rejections as recited in the office actions, and then repeated in the ANSWER, based on the grounds that (a) the rejections simply ignore the plain language and express limitations of the claims; and/or (b) cites references that do not support his arguments. The following are just some of the instances of these errors. (The paragraph numbers below correspond to the paragraph numbers in the Examiner's Answer).

1, 2, 3. Rejection of claim 1 and Martin

Claim 1 expressly calls for " an extractor coupled to said input port and adapted to selectively extract said audio component from said composite signal without extracting said video signal ." The examiner takes the position that Martin teaches the elements of claim 1 including the extractor as recited above at col. 7, lines 56-67 and col. 8, line 1 (See Answer, Page 1). However the cited portion of Martin reads in part as follows(emphasis added): "In case of received audio and video signals, the MPEG packets containing these signals are demultiplexed and filtered so as to pass real time audio and video data in the form off a packetized elementary stream of audio and visual data to dedicated audio and video processors (decoders). 246, 248." It is clear from this passage that the audio and video data are always processed together, at the same time. Therefore the Examiner's position that Martin teaches or discloses this element is just plain wrong.

5. The Rejection of Claims 7, 26, 27, 35 and 36 over Martin

Claim 7 (as well as claim 35) recites that the "processor includes a folder circuit adapted to fold said multichannel audio signal to generate said stereo audio signal." In other words, in the present application, a multichannel audio signal (e.g., a 5.1, 6.1, 7.1 channel audio signal) is processed to generate a conventional 2 channel (e.g., left and right) stereo signal. The Examiner takes the position that this feature of the invention is disclosed at col. 6, lines 7-24). The Applicants have reviewed the Martin reference and did not find any disclosure of this feature. In fact, Martin does not contain the word "stereo" or "fold."

The Applicant fails to understand why claim 27 is incorporated into this grouping. Claim 27 recites that inter alia the step of: "extracting from said multimedia program a metadata component and storing said metadata component as part of said audio file." This feature refers to obtaining some information from metadata about the multimedia program being processed and storing this information together with the audio file. There is no disclosure in Martin of this feature.

6. Claim 18 and Martin

Claim 18 includes the limitation of "extracting from said multimedia program a metadata component and storing said metadata component as part of said audio file." The Examiner refers to col. 5, lines 32-67 in Martin and states that this portion is somehow relevant. It is respectfully submitted that the Examiner is wrong and there is nothing relevant in this passage that resembles the limitations of claim 18.

5, 6, 7. (sic—see Answer at page 6) Claims 11, 14, 15, 28, 33 and 34 and Martin

Similarly to claim 1, claim 11 also recites an apparatus including "an extractor responsive to said commands and adapted to receive said multimedia program and to selectively extract said audio component without extracting said video component from said multimedia program. " As discussed above, Martin simply does not disclose an apparatus of this kind. The same arguments apply regarding the rejection of claim 38.

Similarly to claim 7, claim 14 and 34 also recites "an encoder adapted to encode the folded audio signal using a standard compression protocol to generate said digital output signal". As discussed above and contrary to the Examiner's allegations, Martin does not disclose such a folder.

8, 9. Claims 14, 15 and Martin

In addition to the folding circuit, claim 14 further recites "an encoder adapted to encode the folded audio signal using a standard compression protocol to generate said digital output signal". Once again, the Examiner erroneously asserts that Martin includes both a folder and an encoder as recited. The Examiner relies on col. 10, lines 19-44 as disclosing the encoder. The Applicant disagrees. Claim 14 calls for taking the folded audio signal and encoding it. Martin has nothing whatsoever to do with a system and method as claimed wherein a multichannel audio signal is folded into a compressed audio signal using a compression scheme such as MPEG.

The Examiner continues to mischaracterize the prior art in his arguments presented on pages 11-19 of his answer. For example, looking at the portion of Martin reproduced on top of page 11, the patent clearly describes that MPEG packets contain **both received audio and video signals** (see lines 60-62). The patent goes on further to state that these packets "are demultiplexed and filtered so as to pass real time audio and video data..." (lines 62-66). These signals are then passed to dedicated audio and video processors (decoders) 246, 248 (lines 64-66). The Examiner cites this description to support his position emphasized in bold and underlined text that **"Audio signals are filtered (i.e. extracted) from video signals and processed separately..."** . This statement is incorrect and is not supported by the cited portion of Martin. When viewed as a whole, the passage and the corresponding drawings describe that composite MPEG packets are received in Martin, and that **both** audio and video signals are extracted from these MPEG packets and processed at the same time. The extracted video portion is then passed to the video section to be played as video signals and the audio portion is simultaneously passed to the audio section and played as audio signals simultaneously with the video signals. On the other hand, in the present application, the audio portion is extracted from a composite signal (not a purely video signal as the Examiner misstates) without the video being extracted or played. In fact, it is not understood how an audio signal can be extracted from a video signal. In any event, at no time does Martin disclose processing an audio signal without processing the video.

This same nonsensical argument is repeated on pages 12, 13, 14, 15, 16 and 17.

On page 18, the Examiner addresses the issue related to the lack of a folder for the audio signals, and once again, he fails to make a convincing argument. As discussed above, as used in the present application, a folder is a device that takes a multichannel audio signal such as a 5, 5.1, 6.1 channel signal and converts it into a two channel signal. There is absolutely no discussion anywhere in Martin about such a device. Certainly the passage reproduced on page 18 is no help since it has nothing to do with, and remains completely silent as to whether the audio signals described are multichannel signals, stereo signals or any other kinds of signals.

It is well known that in order for a reference to anticipate a claim, the reference must disclose each and every element of the claim. It is respectfully submitted that the Examiner has failed to meet his burden that the reference contains many of the claimed elements, including the extractor and the folder. Accordingly, it is respectfully requested that the Examiner be reversed.

Respectfully submitted,
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